

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:22-CR-612
	§	
TOM COOPERMAN	§	
	§	

**MOTION FOR TEMPORARY RETURN
OF PASSPORT AND PERMISSION TO TRAVEL**

TO THE HONORABLE JUDGE ANDREW S. HANEN:

COMES NOW, Tom Cooperman and hereby requests this Court allow the temporary return of his passport and permission to travel for work.

I.

Mr. Cooperman requests permission to travel from Houston to Bangkok, Thailand on April 11, 2023. Mr. Cooperman would perform in Bangkok on April 13, 2023. He would then travel to Yangon, Myanmar on April 14, 2023, to perform that evening. After that show, he would travel to Atlantic City, New Jersey to perform the evening of April 15, 2023. He would then fly back to Houston on April 16, 2023.¹

II.

Mr. Cooperman remains in perfect standing with Pretrial Services. His passport was collected by and is currently being held in the custody of Pretrial Service. Mr. Cooperman

¹ The details regarding these shows have been provided to Mr. Cooperman's supervision officer and will be filed under seal as Exhibit A to this Motion.

is also monitored via GPS device. His supervision officer directed him to ask the Court to order that the GPS device be temporarily removed, his monitoring be temporarily suspended, and the GPS device be reinstalled upon his return to Houston.

WHEREFORE PREMISES CONSIDERED, Mr. Cooperman respectfully requests this Court allow the temporary return of his passport and travel as requested herein.

Respectfully Submitted,

/s/ Chip Lewis
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CERTIFICATE OF CONFERENCE

On March 10, 2023, counsel for Defendant conferred with the government their position on Defendant's Motion for Temporary Return of Passport and Permission to Travel and they advised: the government is OPPOSED.

/s/ Chip Lewis
CHIP LEWIS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant's Motion for Temporary Return of Passport and Permission to Travel has been forward via electronic mail to the government on this the 10th day of March 2023.

/s/ Chip Lewis
CHIP LEWIS